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Attorneys for Plaintiffs
HTC CORPORATION and
HTC AMERICA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

HTC CORPORATION and HTC
AMERICA, INC.,

Plaintiffs,

v.

TECHNOLOGY PROPERTIES
LIMITED, PATRIOT SCIENTIFIC
CORPORATION, and ALLIACENSE
LIMITED,

Defendants.

Case No. 5:08-CV-00882 PSG

(Related to Case No. 5:08-CV-00877 PSG)

**DECLARATION OF KYLE D. CHEN
IN SUPPORT OF PLAINTIFFS' OPPOSITION
TO DEFENDANTS' MOTION *IN LIMINE*
NO. 5 TO EXCLUDE THE TESTIMONY OF
DAVID MAY**

Complaint Filed: February 8, 2008
Trial Date: September 23, 2013

Date: August 29, 2013
Time: 10:00 a.m.
Place: Courtroom 5, 4th Floor
Judge: Hon. Paul S. Grewal

1 I, Kyle D Chen, declare as follows:

2 1. I am an attorney at the law firm of Cooley LLP, counsel in this action for Plaintiffs
3 HTC Corporation and HTC America, Inc. (collectively "HTC"). I make this declaration in support
4 of Plaintiffs' Opposition to Defendants' Motion *in Limine* No. 5 To Exclude the Testimony of Dr.
5 David May. I have personal knowledge of the facts contained within this declaration, and if called
6 as a witness, could testify competently to the matters contained herein.

7 2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the
8 deposition of Michael David May, Ph.D., taken on July 15, 2013.

9 3. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from the Expert
10 Report of David May on the Invalidity of U.S. Patent No. 5,530,890, dated June 4, 2013 ("May
11 Expert Report").

12 4. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from Exhibit G,
13 '890 Invalidity Chart: Analysis of Transputer Architecture for U.S. Patent 5,530,890, to the May
14 Expert Report.

15 5. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from Exhibit H,
16 '890 Invalidity Chart: Analysis of ARM for U.S. Patent 5,530,890, to the May Expert Report.

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18 I declare under penalty of perjury that to the best of my knowledge the foregoing is true
19 and correct. Executed on August 22, 2013 in Palo Alto, California.

20 _____
/s/ Kyle D. Chen

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